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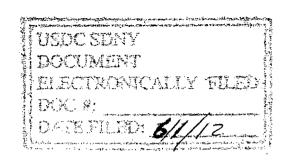
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May 23, 2012



By Hand Delivery

Honorable Deborah A. Batts United States District Judge Southern District of New York 500 Pearl Street, Room 2510 New York, New York 10007

Re:

United States v. Samir Barai

11 Cr. 116 (DAB)

Dear Judge Batts:

Defendant Samir Barai, through counsel, respectfully submits this letter requesting permission to modify his bail conditions to permit travel throughout the continental United States.

Mr. Barai was arrested and presented on February 8, 2011 on a complaint charging him with securities fraud and other offenses. Mr. Barai was released on a personal recognizance bond of \$1 million, secured by two co-signers and \$500,000 in real property. In addition, Mr. Barai was ordered to surrender his passport. Travel was restricted to the SDNY, EDNY and District of New Jersey.

On May 27, 2011, Mr. Barai pled guilty, pursuant to a cooperation agreement, to a four-count information. Bail was continued as previously set.

At this time, the defense requests that the Court modify the terms of release to permit Mr. Barai to travel throughout the continental United States in order to pursue various potential

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Honorable Deborah A. Batts May 23, 2012 Page - 2 -

business opportunities. We have spoken to AUSA Avi Weitzman and to Mr. Barai's Pre-trial Services Officer, Dina Naftaliev, and both have consented to this request.

Respectfully submitted,

Evan T. Barr

cc: Avi Weitzman, AUSA Dina Naftaliev, PTS

SO ORDERED this 24 day of May, 2012.

both a. Batta

Honorable Deborah A. Batts United States District Judge